

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

339231



Richard Tisch, Chief
Water Enforcement Branch

May 22, 1979

Michael V. Polito
Emergency Response & Inspection Branch

Duane Marine - SPCC Plan Conformance

THRU: Fred N. Rubel, Chief
Emergency Response & Inspection Branch

I have reviewed the SPCC plan of the Duane Marine Corporation, 26 Washington Street, Perth Amboy, New Jersey, and concurrently visited their facility at that address on May 14th and 17th. This review was initiated as described in my memorandum to Fred Rubel dated May 21, 1979, a copy of which is attached.

Based on my desk review and site visits, I have noted the following deficiencies:

1. Improvement number 2, page 1 of the attached SPCC Plan has not been implemented.
2. The containment in the tank truck unloading area is inadequate. The facility is relying on a slope of approximately 0.01 inch per foot to control possible spills from tank trucks whose capacity could be in the 4000-5000 gallon range.
3. The facility stores about 3000 drums containing in whole or in part waste oils or other oil containing solvents. The SPCC plan not only does not address this drum storage but no suitable containment for drum spillage or runoff exists.
4. No records of inspections called for in page 5 of the SPCC Plan, item 9 could be produced during my inspection although the company president, Mr. Lecarreux, says they are maintained.
5. An inground scale has not been addressed in the SPCC Plan. Considering that rainwater and facility runoff would flow down into the scale basin, and must be removed, a possibility of direct connection to navigable water exists. This scale area must be evaluated for its spill potential.

2-SA-ERI-MVPolito:jkw:Bldg.209:X6652

CONCURRENCES							
SYMBOL	SA/ERI	SA/ERI					
SURNAME	POLITO	RUBEL					
DATE	5/19/79						

6. Facility drainage is not controlled and runs in areas directly to the Arthur Kill, a navigable water of the United States. Because of barrel leakage and truck spillage, this becomes a possible significant spill source and specifically required to be addressed in 40 CFR 112.7(e)(1).

I am still in the process of my review of the site and have written a letter to Duane Marine soliciting additional information. When a reply to this letter is received, I shall update this violation referral.

Mr. Lecarreux has indicated a willingness to quickly correct SPCC Plan deficiencies. Pending a reply to my letter to Mr. Lecarreux of May 17th, it is my intantion to propose a meeting with him and his professional engineer for the purpose of immediate correction.

Please place this case among the next to be processed in accordance with Fred Rubel's letter of December 18, 1978 even though additional facts may be supplied.

Attachments

CC: Barbara Metzger

M. Kue

Richard Fisch, Chief
Water Enforcement Branch

May 22, 1979

Michael V. Polito
Emergency Response & Inspection Branch

Duane Marine - SPCC Plan Conformance

THRU: Fred H. Rubel, Chief
Emergency Response & Inspection Branch

I have reviewed the SPCC plan of the Duane Marine Corporation, 26 Washington Street, Perth Amboy, New Jersey, and concurrently visited their facility at that address on May 14th and 17th. This review was initiated as described in my memorandum to Fred Rubel dated May 22, 1979, a copy of which is attached.

Based on my desk review and site visits, I have noted the following deficiencies:

1. Improvement number 2, page 1 of the attached SPCC Plan has not been implemented.
2. The containment in the tank truck unloading area is inadequate. The facility is relying on a slope of approximately 0.01 inch per foot to control possible spills from tank trucks whose capacity could be in the 4000-5000 gallon range.
3. The facility stores about 3000 drums containing in whole or in part waste oils or other oil containing solvents. The SPCC plan not only does not address this drum storage but no suitable containment for drum spillage or runoff exists.
4. No records of inspections called for in page 5 of the SPCC Plan, item 9 could be produced during my inspection although the company president, Mr. Lacarreaux, says they are maintained.
5. An inground scale has not been addressed in the SPCC Plan. Considering that rainwater and facility runoff would flow down into the scale basin, and must be removed, a possibility of direct connection to navigable water exists. This scale area must be evaluated for its spill potential.

2-SA-ERI-MVPolito:jkw:Bldg.209:X6652

SA/ERI SA/ERI
POLITO RUBEL

14

6. Facility drainage is not controlled and runs in areas directly to the Arthur Kill, a navigable water of the United States. Because of barrel leakage and truck spillage, this becomes a possible significant spill source and specifically required to be addressed in 40 CFR 112.7(a)(1).

I am still in the process of my review of the site and have written a letter to Duane Marine soliciting additional information. When a reply to this letter is received, I shall update this violation referral.

Mr. Lecarreux has indicated a willingness to quickly correct SPCC Plan deficiencies. Pending a reply to my letter to Mr. Lecarreux of May 17th, it is my intention to propose a meeting with him and his professional engineer for the purpose of immediate correction.

Please place this case among the next to be processed in accordance with Fred Rubel's letter of December 18, 1978 even though additional facts may be supplied.

Attachments

CC: Barbara Metzger

*Charlie Hoffman or
Larry Diamond to do
not to proceed - Sebnick's letter*